BASS, BERRY & SIM-S-PLEC

ATTORNEYS AT LAW

OTHER OFFICES

MEMPHIS

TARA L SWAFFORD TEL (615) 742-7731 FAX (615) 742-2840 tswafford@bassberry com

AMSOUTH CENTER 2004 1147 26 PT 12-58 NASHVILLE MUSIC ROW KNOXVILLE 315 DEADERICK STREET, SUITE 2700

NASHVILLE, TN 37238-3001 (615) 742-6200

T.R.A. DOCKET ROOM

www.bassberry.com

May 26, 2004

### VIA HAND DELIVERY

Ms. Deborah Taylor Tate, Chairman TENNESSEE REGULATORY AUTHORITY 460 James Robertson Parkway Nashville, Tennessee 37243

> Re: Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives Request for Suspension of Wireline to Wireless Number Portability Obligations Pursuant to Section 251(f)(2) of the Communications Act of 1934, as Amended Docket No. 03-00633

#### Dear Chairman Tate:

Enclosed for filing in the above-referenced docket are the original and thirteen copies of The Coalition's Opposition to Motion to Intervene by SprintCom, Inc. in the above-referenced matter.

Should you have any questions with respect to this filing, please do not hesitate to contact me at the number shown above.

. Thanking you in advance for your assistance with this matter, I am

TLS:bb Enclosures

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)	
	)	
TENNESSEE COALITION OF RURAL	)	
INCUMBENT TELEPHONE COMPANIES	)	<b>DOCKET NO. 03-00633</b>
AND COOPERATIVES REQUEST FOR	)	
SUSPENSION OF WIRELINE TO WIRELESS	)	
NUMBER PORTABILITY OBLIGATIONS	)	
PURSUANT TO SECTION 251(f)(2) OF THE	)	
COMMUNICATIONS ACT OF 1934, AS	)	
AMENDED	)	
	)	
	)	

# THE COALITION'S OPPOSITION TO MOTION TO INTERVENE BY SPRINTCOM, INC.

The Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives (the "Coalition") hereby responds to the petition filed by SprintCom, Inc. d/b/a Sprint PCS ("Sprint") for leave to intervene in this proceeding. The Coalition opposes this petition as untimely filed due to the Scheduling Order that has already been entered in this case. The parties have already served discovery requests, and responses are due this Thursday, May 27, 2004. In addition, testimony is due next week on June 4, 2004. There is simply no time to accommodate the intervention of Sprint in this schedule.

Alternatively, if Sprint's petition to intervene is granted, then there will need to be additional time built into the Scheduling Order to provide for their intervention. A minimum of at least two to three weeks would be needed to accommodate this new party. Accordingly, the Coalition opposes the petition by Sprint to intervene or, in the alternative, suggests that the Scheduling Order be amended by moving the discovery and testimony deadlines and the interim suspension by approximately two or three weeks. The interim suspension would need to be

moved because there would not be enough time for the TRA to hold a hearing and render its decision by July 23, 2004 if the schedule is postponed by two or three weeks.

Respectfully submitted, The Tennessee Coalition of Incumbent Rural Telephone Companies and Cooperatives

By:

R. Dale Grimes (006221) Tara L. Swafford (17577) Bass, Berry & Sims PLC

315 Deaderick Street, Suite 2700

Nashville, TN 37238-3001

(615) 742-6244

Of Counsel:

Thomas J. Moorman Stephen G. Kraskin Kraskin, Moorman & Cosson LLC 2120 L Street N.W. Suite 520 Washington, D.C. 20037 202-296-8890

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on May 2004, upon:

Paul G. Summers, Esq. Vance L. Broemel, Esq. Timothy C. Phillips, Esq. Office of the Attorney General Consumer Advocate and Protection Division	Hand delivery U. S. Maıl Facsımile	
425 5th Avenue North Nashville, Tennessee 37202	Hand delivery U. S. Mail	[4]
Melvin J. Malone, Esq. Miller & Martin, PLLC 1200 One Nashville Place 150 Fourth Avenue, North Nashville, Tennessee 37219-2433	Facsımıle	ij
Edward Phillips SprintCom, Inc. d/b/a Sprint PCS Mailstop: NCWKFR0313 14111 Capital Boulevard Wake Forest, NC 27587-5900	Hand delivery U. S. Mail Facsimile	

Janof SMD